

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

IN RE:	§	CASE NO. 10-20052-C-13
	§	
OLGA CARRANZA,	§	
Debtor	§	CHAPTER 13
	§	
U.S. BANK, N.A., ITS ASSIGNS	§	
AND/OR SUCCESSORS IN	§	
INTEREST,	§	
Movant	§	HEARING DATE: _____
	§	
v.	§	TIME: _____
	§	
OLGA CARRANZA; and CINDY	§	
BOUDLOCHE, Trustee	§	
Respondents	§	JUDGE RICHARD S. SCHMIDT

**MOTION FOR ENTRY OF AGREED ORDER TERMINATING AUTOMATIC STAY
REGARDING NON-EXEMPT PROPERTY**

THIS IS A MOTION FOR ENTRY OF AN AGREED ORDER TERMINATING THE AUTOMATIC STAY. IF YOU OBJECT TO THE GRANTING OF RELIEF, YOU SHOULD CONTACT THE MOVANT IMMEDIATELY TO TRY TO REACH AN AGREEMENT. IF YOU CANNOT REACH AN AGREEMENT, YOU MUST FILE A WRITTEN RESPONSE AND SEND A COPY TO MOVANT WITHIN 14 DAYS OF THE DATE THIS WAS MAILED TO YOU. IF NO TIMELY OPPOSITION IS FILED, THE COURT MAY GRANT THE RELIEF WITHOUT A HEARING.

1. Movant: U.S. BANK, N.A., ITS ASSIGNS AND/OR SUCCESSORS IN INTEREST
2. Movant, directly or as agent for the holder, holds a security interest in

625 NAPLES
CORPUS CHRISTI, TX 78404

THE EASTERLY 48.3' MORE OR LESS OF LOT SIXTEEN (16) AND THE WESTERLY 2' MORE OR LESS OF LOT SEVENTEEN (17), BLOCK THRITY-NINE (39), DEL MAR, A SUBDIVISION OF THE CITY OF CORPUS CHRISTI, NUECES COUNTY, TEXAS, AS SHOWN BY THE MAP OR PLAT THEREOF RECORDED IN VOLUME 4, PAGES 8-12, MAP RECORDS OF NUECES COUNTY, TEXAS, TO WHICH REFERENCE IS HERE MADE FOR ALL PERTINENET PURPOSES.

3. The Debtor's exemptions X have have not been allowed.
4. Type of collateral: Real Estate.

5. Debtor's scheduled value of property: \$45,000.00.
6. Movant's estimated value of property: \$84,907.00.
7. Total amount owed to movant: \$27,041.51.
8. Estimated equity (paragraph 6 minus paragraph 7): \$57,865.49.
9. Total pre and post-petition arrearages: \$4,922.92.
10. Total post-petition arrearages: \$4,252.15.
11. Amount of unpaid, past due property taxes, if applicable: Unknown.
12. Expiration date on insurance policy, if applicable: Unknown.
13. Movant and Debtor have agreed to terminate the automatic stay pursuant to the terms of the attached agreed order. Accordingly, the parties request entry of the agreed order.

Date: 08/24/2010

/s/ CHERI ABBAGE

CHERI ABBAGE
TX NO. 24010302
S.D. TX NO. 1009125
1900 ST. JAMES PLACE SUITE 500
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ATTORNEY FOR MOVANT

Certificate of Service and Certificate of Compliance with BLR 4001

A copy of this motion was served on the persons shown on exhibit "1" at the addresses reflected on that exhibit on August 24, 2010 via electronic means as listed on the Court's ECF Noticing System or by prepaid United States first class mail. Movant certifies that movant has complied with Bankruptcy Local Rule 4001.

/s/ CHERI ABBAGE

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HOUSTON, TX 77056

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Facsimile: (972) 386-7673

E-mail: SDECF@BDFGROUP.COM

ATTORNEY FOR MOVANT

EXHIBIT 1

DEBTORS:

OLGA CARRANZA
625 NAPLES
CORPUS CHRISTI, TX 78404

OLGA CARRANZA
3034 AUSTIN ST.
CORPUS CHRISTI, TX 78404

TRUSTEE:

CINDY BOUDLOCHE
555 N. CARANCAHUA, STE. 600
CORPUS CHRISTI, TX 78478

DEBTOR'S ATTORNEY:

VIVIANA S. CAVADA
4646 CORONA, STE 165
CORPUS CHRISTI, TX 78411

PARTIES IN INTEREST:

NAVY ARMY FED CR UNION
PO BOX 81349
CORPUS CHRISTI, TX 78468

PARTIES REQUESTING NOTICE:

GE MONEY BANK
C/O RECOVERY MANAGEMENT SYSTEMS CORP.
25 SE 2ND AVE, SUITE 1120
MIAMI, FL 33131-1605

NUECES COUNTY
C/O LINEBARGER GOGGAN BLAIR & SAMPSON, LLP
2700 VIA FORTUNA DR, STE 400
P.O. BOX 17428
AUSTIN, TX 78760-7428